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Assurance Company  
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8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF WASHINGTON  
AT SPOKANE  
10

11 BERKLEY ASSURANCE COMPANY,

12 Plaintiff,

13 v.

14 INLAND WASHINGTON, LLC; and  
15 RS CONSTRUCTION &  
EXCAVATION, INC.,

16 Defendants.  
17

No.: 2:18-cv-00176-SAB

STIPULATED MOTION TO DISMISS  
ALL CLAIMS WITH PREJUDICE

18 **STIPULATION**

19 Plaintiff Berkley Assurance Company (“Berkley”) and Defendant Inland  
20 Washington, LLC (“Inland”) (collectively, the “Parties”) stipulate that Berkley’s  
21 claim for declaratory relief and Inland’s counterclaims, including but not limited to  
22 all contractual and extra-contractual claims, are fully compromised and should be  
23 dismissed with prejudice and without an award of costs or fees to any of the Parties.  
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1 IT IS SO ORDERED this \_\_\_\_ day of March 2019.  
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5 \_\_\_\_\_  
6 THE HONORABLE STANLEY A. BASTIAN

7 Submitted by:

8 BULLIVANT HOUSER BAILEY, PC

9 By /s/ Daniel R. Bentson

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15 Attorneys for Plaintiff Berkley Assurance Company

16 LAW OFFICE OF JOHN H. GUIN, PLLC

17 By /s/ John H. Guin

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23 Attorney for Defendant Inland Washington, LLC  
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**CERTIFICATE OF SERVICE**

I hereby certify that on March 28, 2019, I electronically filed the foregoing with the Clerk of the Court using the e-filing system which will send notification of such filing to the persons listed below:

John H. Guin  
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*Attorney for Defendant Inland  
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Dated: March 28, 2019.

/s/ Genevieve Schmidt  
Genevieve Schmidt, Legal Assistant

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